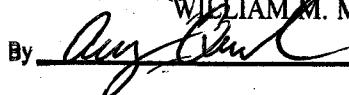


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7 Presented to the Court by the foreman of the
8 Grand Jury in open Court, in the presence of
9 the Grand Jury and FILED in the U.S.
10 DISTRICT COURT at Seattle, Washington.

11 August 3 2017
12 WILLIAM M. McCOOL, Clerk
13 By  Deputy

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15
16 UNITED STATES DISTRICT COURT
17 WESTERN DISTRICT OF WASHINGTON
18 AT SEATTLE

19 CR17-190 RSL

20 UNITED STATES OF AMERICA,) CASE NO.
21)
22 Plaintiff,) INDICTMENT
23)
24 v.)
25)
26 RIBEIRO TRELHA GUSTAVO,)
27 a/k/a Matos Fontinele,)
28 Defendant.)

19
20 The Grand Jury charges that:

21 **COUNT 1**
22 (Access Device Fraud)

23 On or about April 27, 2017, in King County, within the Western District of
24 Washington, defendant RIBEIRO TRELHA GUSTAVO knowingly, and with intent to
25 defraud, possessed at least fifteen or more unauthorized and counterfeit access devices as
26 defined in Title 18, United States Code, Section 1029(e), said possession affecting
27 interstate and foreign commerce because, among other things, some of the unauthorized
28 and counterfeit access devices related to accounts maintained by financial institutions

INDICTMENT / GUSTAVO - 1

UNITED STATES ATTORNEY
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1 located outside Washington State, and some of those unauthorized and counterfeit
2 access devices traveled in interstate and foreign commerce.

3 All in violation of Title 18, United States Code, Sections 1029(a)(3) and 2.
4

5 **COUNT 2**
6 **(Access Device Fraud)**

7 On or about April 27, 2017, in King County, within the Western District of
8 Washington, defendant RIBEIRO TRELHA GUSTAVO knowingly and with
9 intent to defraud, possessed, produced, trafficked in, and had custody and control
10 of device-making equipment, specifically, a card-encoding device (also known as
11 a “reader/writer”) and two credit card “skimmers,” which conduct affected
12 interstate and foreign commerce because, among other things, the devices were
13 used in connection with access devices related to accounts maintained by financial
14 institutions located outside Washington State.

15 All in violation of Title 18, United States Code, Sections 1029(a)(4) and 2.
16

17 **ALLEGATIONS OF FORFEITURE**

18 The allegations contained in Counts One and Two of this Indictment are realleged
19 and incorporated herein by reference for the purpose of forfeiture pursuant to Title 18,
20 United States Code, Section 1029(c)(1)(C).

21 Upon conviction of either Count One or Two of this Indictment, RIBEIRO
22 TRELHA GUSTAVO shall forfeit to the United States, any property, real or personal,
23 which constitutes or is derived from proceeds traceable to violations of Title 18, United
24 States Code, Sections 1029(a)(3) and (a)(4) or property used or intended to be used to
25 commit and to facilitate violations of Title 18, United States Code, Sections 1029(a)(3)
26 and (a)(4), including but not limited to the following:

- 27 a. A sum of money representing the proceeds obtained as a result of the charged
28 offenses.

- 1 b. Lenovo Laptop Computer, Serial #YD01VU2Y
- 2 c. My Passport Hard Drive, Serial #WX21A17E0L4K;
- 3 d. My Passport Ultra Hard Drive, no serial number
- 4 e. My Passport Hard Drive, Serial #WXE1A17JN0XZ
- 5 f. Three (3) SanDisk SD memory cards, no serial numbers
- 6 g. Apple iPhone 7, no serial number

7 **Substitute Assets.** If any of the above-described forfeitable property, as a result
8 of any act or omission of the Defendant

- 9 (1) cannot be located upon the exercise of due diligence;
- 10 (2) has been transferred or sold to, or disposed with, a third party;
- 11 (3) has been placed beyond the jurisdiction of the Court;
- 12 (4) has been substantially diminished in value; or
- 13 (5) has been commingled with other property which cannot be
14 subdivided without difficulty;

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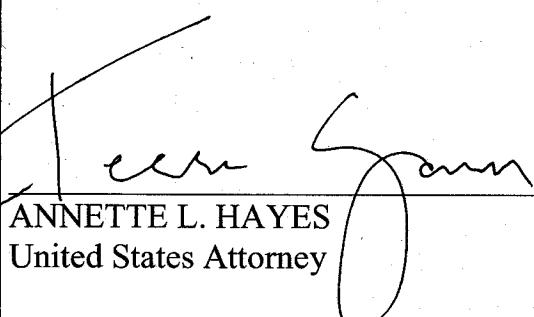
1 the United States of America shall be entitled to forfeiture of substitute property pursuant
2 to Title 21, United States Code, Section 853(p).
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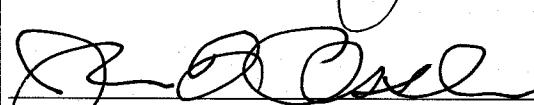
A TRUE BILL:

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6 DATED: 8/3/2017
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**Signature of Foreperson redacted pursuant
to the policy of the Judicial Conference of the
United States.**

FOREPERSON


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ANNETTE L. HAYES
United States Attorney


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JAMES D. OESTERLE
Assistant United States Attorney


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BENJAMIN T. DIGGS
Special Assistant United States Attorney

INDICTMENT / GUSTAVO - 4

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